

# DAVISON • EASTMAN • MUÑOZ • PAONE, P.A.

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CERTIFIED BY THE SUPREME COURT  
OF NEW JERSEY AS A:  
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• LL.M. IN TAXATION  
□ R. 1:40 QUALIFIED MEDIATOR

OTHER STATE ADMISSIONS:  
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April 4, 2022

## VIA ECF

Hon. Freda L. Wolfson, Chief Judge  
United States District Court- District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Room 2020  
Trenton, NJ 08608

**RE: Avi Alexander Rachlin v. George Baumann, et al.**  
**Civil Action No.: 21-cv-15343**  
**Request to Adjourn Motion Return Date**  
**With Consent of Counsel from May 2, 2022 to May 16, 2022.**

Dear Chief Judge Wolfson:

As you know, this office represents the Defendants, George K. Baumann and Freehold Township in connection with the above captioned matter. Currently pending before Your Honor is the Plaintiff's Motion to Seal Documents, wherein the said Motion is currently returnable on May 2, 2022.

Please note that I will be out of state from April 12, 2022 through April 20, 2022 on a pre-planned vacation with my family. As such and in accordance with Local Civil Rule 7.1(d)(5), the Defendants respectfully request that the pending Motion to Seal be adjourned one motion cycle, from **May 2, 2022** until **May 16, 2022**, which is the next motion return date. *See* L.Civ.R. 78.1.

Plaintiff's counsel has consented to this request. *See* L.Civ.R. 7.1(d)(5).

Respectfully submitted,

  
TIMOTHY C. MORIARTY

TCM:kld

cc: Eric L. Harrison, Esq. (via ECF)  
Edward A. Paltzik, Esq. (via ECF)

SO ORDERED:  
s/ Tonianne J. Bongiovanni  
**TONIANNE J. BONGIOVANNI**  
**United States Magistrate Judge**  
Dated: April 5, 2022